

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ,  
HANNAH PEARCE, MARCUS MARTIN,  
NATALIE ROMERO, CHELSEA  
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCH”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**PLAINTIFFS’ MOTION TO SEAL CERTAIN EXHIBITS TO PLAINTIFFS’ MOTION  
TO COMPEL DEFENDANT NATIONAL SOCIALIST MOVEMENT TO DISCLOSE  
CUSTODIANS OF DISCOVERABLE DOCUMENTS AND INFORMATION**

On September 3, 2019, Plaintiffs filed a Motion to Compel Defendant National Socialist Movement to Disclose Custodians of Discoverable Documents and Information (the “Motion to Compel”). (ECF No. 547.) For the reasons set forth below, Plaintiffs hereby respectfully request that the Court enter the enclosed proposed order sealing Exhibits 4 and 5 to Plaintiffs’ Motion to Compel, which were submitted conditionally under seal today in this matter.

Exhibit 5 to Plaintiffs’ Motion to Compel was designated Highly Confidential by Defendants Schoep, National Socialist Movement, and Nationalist Front pursuant to the Order for the Production of Documents and Exchange of Confidential Information on January 3, 2018 (ECF No. 167, the “Protective Order”). Additionally, Exhibit 4 contains Confidential information as defined by the terms of the Protective Order. Although Plaintiffs reserve their right to challenge all designations, for the reasons set forth herein, Plaintiffs request that Exhibits 4 and 5 to Plaintiffs’ Motion to Compel be sealed in accordance with Local Rule 9.

Dated: September 3, 2019

Respectfully submitted,  
/s/  
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### CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2019, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on September 3, 2019, I also served the following non-ECF participants, via electronic mail, as follows:

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